



August 5, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On December 3, 2015, Coon Creek Telephone (FRN: 0003756764) refiled its June 2015 Form 477 data (see attached "Form 477 Filing Summary"). The revised filing more accurately reflected the actual 10/1 availability within the Coon Creek study area.

Last week, via Public Notice DA 16-869, the Wireline Competition Bureau issued offers of model support to hundreds of RLECs, including Coon Creek Telephone. Report 7.3, issued along with the Public Notice, showed Coon Creek Telephone having 10/1 availability to 311 of its 363 model eligible locations (85.7%).

I believe Report 7.3 is drawing from Coon Creek's original June 2015 Form 477 data, rather than the revised version filed in December, for this calculation. Coon Creek Telephone looks forward to selecting the model-based USF funding path, and is grateful that a model offer has been extended to it. Because it is possible, however, for the FCC to reduce the 10/1 Mbps 90% availability threshold for model participation, I want to make sure the FCC is utilizing the accurate Form 477 information for Coon Creek Telephone.

Our calculations indicate that only 89 of 363 model-eligible locations are located within census blocks with 10/1 availability (24.5%). I have attached to this letter a map and list of model-eligible census blocks with 10//1 availability. The orange color shows 10//1 availability, the

bright green shows model-eligibility, and the dull green shows the census blocks that are both model-eligible and have 10/1 availability.

Paragraph of 66 of the Rate-of-Return USF Reform Order notes the FCC will make model-offers based on June 2015 FCC Form 477 data "that has been submitted as of the date of release of this Order." Because the Coon Creek Telephone revised Form 477 data was filed several months prior to the March 30 release of the USF Reform Order, we are requesting the FCC utilize Coon Creek's accurate Form 477 data when considering model eligibility.

I appreciate the FCC's leadership in USF reform and hope you will contact me if you have any questions on this ex parte letter or our revised Form 477 filings.

Sincerely,

A handwritten signature in black ink, appearing to read "Deb Lucht", written in a cursive style.

Deb Lucht

General Manager/CEO

Coon Creek Telephone



(RETAIN FOR YOUR RECORDS)
Form 477 Filing Summary

FRN: 0003756764 | Data as of: Jun 30, 2015 | Operations: ILEC | Submission Status: Revised - Submitted | Last Updated: Dec 9, 2015 14:12:25

Filer Identification

Section	Question	Response
Filer Information	Provider Name	Coon Creek Telephone Company
	Holding Company Name	Coon Creek Telephone Company
	SAC ID	351136
	499 ID	801654
Data Contact Information	Data Contact Name	Lia Wendt
	Data Contact Phone Number	(319) 454-6234
	Data Contact E-mail	liaw@cooncreektelephone.com
Emergency Operations Contact Information	Emergency Operations Name	Craig Van Soyoc
	Emergency Operations Phone Number	(319) 454-6234
	Emergency Operations E-mail	craigvs@netins.net
Certifying Official Contact Information	Certifying Official Name	Debra Lucht
	Certifying Official Phone Number	(319) 454-6234
	Certifying Official E-mail	debral@cooncreektelephone.com

Data Submitted

Form Section	File Name	Date & Time	Number of Rows
Fixed Broadband Deployment	064 Fixed Broadband 06302015-Revised.csv	Dec 3, 2015 16:13:23	141
Fixed Broadband Subscription	064 Fixed Broadband 06302015.csv	Dec 3, 2015 15:48:32	8
Fixed Voice Subscription	064 Voice Telephone Subscription Detail 06302015.csv	Dec 3, 2015 15:48:32	6

Fixed Broadband Deployment

Census Block Counts by State, DBA Name and Technology

State	DBA Name	Technology	Blocks
Iowa	revised063015	Asymmetric xDSL	141
Total			141

**Fixed
Broadband
Subscription****Fixed Broadband Subscriptions by State, Technology and End-user Type**

State	Technology	Census Tracts	Subscriptions		
			Consumer	Business / Govt	Total
Iowa	Asymmetric xDSL	8	337	34	371
Total		8	337	34	371

Fixed Broadband Subscriptions by Bandwidths and End-user Type

Downstream Bandwidth (in Mbps)	Upstream Bandwidth (in Mbps)	Consumer	Business / Govt	Total
1.000	768.000	234	21	255
3.000	1.000	60	9	69
5.000	1.000	41	2	43
10.000	1.000	2	0	2
20.000	1.000	0	2	2
Total		337	34	371

Fixed Broadband Subscriptions by Technology, Bandwidths and End-user Type

Technology	Downstream Bandwidth (in Mbps)	Upstream Bandwidth (in Mbps)	Consumer	Business / Govt	Total
Asymmetric xDSL	1.000	768.000	234	21	255
	3.000	1.000	60	9	69
	5.000	1.000	41	2	43
	10.000	1.000	2	0	2
	20.000	1.000	0	2	2
Total			337	34	371

**Fixed Voice
Subscription****VGE Lines and VoIP Subscriptions by State and End-user Type**

State	Total VGE Lines	Consumer VGE Lines	Total VoIP Subscriptions	Consumer VoIP Subscriptions
Iowa	370	245	0	0
Total	370	245	0	0

**Fixed Voice
Subscription
(VGE Lines)****VGE Lines Provided to Unaffiliated Providers by State**

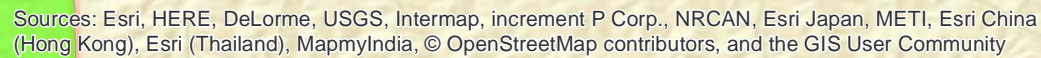
State	Wholesale	UNE-L
Iowa	0	0
Total	0	0

VGE Lines Provided to End Users by State, Bundle and Product Type

State	Total	by Bundle		by Product Type			
		Sold w/ Internet	Sold w/o Internet	Consumer		Bus-Govt	
				& No PIC	& PIC	& No PIC	& PIC
Iowa	370	137	233	37	208	43	82
Total	370	137	233	37	208	43	82

VGE Lines Provided to End Users by State, Ownership and Last-mile Medium

State	Total	by Ownership			by Last-mile Medium			
		Owned	UNE-L	Resale	FTTP	Coax	Fixed Wireless	Copper
Iowa	370	370	0	0	0	0	0	370
Total	370	370	0	0	0	0	0	370



CB	Name	RORorPC	SAC	WiredServed	ILECServed	WirelessServed	TotalActiveSubscribers
190119606001030	Iowa	ROR	351136	Unserved	Served	Unserved	4
190119606001050	Iowa	ROR	351136	Unserved	Served	Unserved	5
190119606001055	Iowa	ROR	351136	Unserved	Served	Unserved	6
190119606001056	Iowa	ROR	351136	Unserved	Served	Unserved	2
190119606001064	Iowa	ROR	351136	Unserved	Served	Unserved	3
190119606001086	Iowa	ROR	351136	Unserved	Served	Unserved	8
190119606001089	Iowa	ROR	351136	Unserved	Served	Unserved	7
190119606001090	Iowa	ROR	351136	Unserved	Served	Unserved	2
190119606001096	Iowa	ROR	351136	Unserved	Served	Unserved	9
190119606001098	Iowa	ROR	351136	Unserved	Served	Unserved	11
190119606001100	Iowa	ROR	351136	Unserved	Served	Unserved	5
190119606001101	Iowa	ROR	351136	Unserved	Served	Unserved	4
190119606001103	Iowa	ROR	351136	Unserved	Served	Unserved	1
190119606001121	Iowa	ROR	351136	Unserved	Served	Unserved	6
190119606001122	Iowa	ROR	351136	Unserved	Served	Unserved	3
190119606001123	Iowa	ROR	351136	Unserved	Served	Unserved	5
190119606001139	Iowa	ROR	351136	Unserved	Served	Unserved	1
190119606001153	Iowa	ROR	351136	Unserved	Served	Unserved	4
190119606001157	Iowa	ROR	351136	Unserved	Served	Unserved	1
190119606002067	Iowa	ROR	351136	Unserved	Served	Unserved	2